

Federal Defenders
OF NEW YORK, INC.

MEMO ENDORSED

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Leonard F. Joy
Executive Director

August 20, 2007

Southern District of New York
John J. Byrnes
Attorney-in-Charge

BY FACSIMILE

Hon. Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RECEIVED
10 20 2007

Re: United States v. Edy Cabreja-Figueroa
No. 07 Cr. 628 (NRB)
Request for Adjournment, on Consent

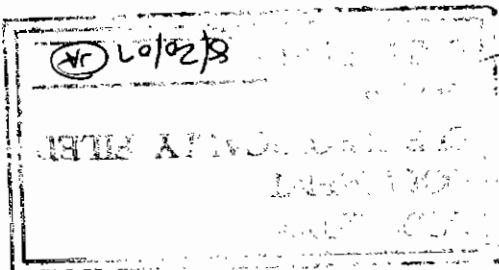
Dear Judge Stein:

At the first pretrial conference in this case, the Court directed that any pretrial motions be filed by August 23, 2007, and scheduled a conference for that afternoon. I am planning to file a motion pursuant to 8 U.S.C. § 1326(d) on Mr. Cabreja-Figueroa's behalf but, due to the complexity of the issues, need approximately two weeks' additional time to complete it. Accordingly, I am writing to respectfully request that the Court extend the motion deadline until Friday, September 7, 2007, and that the Court re-schedule the conference for that day or a date convenient to the Court shortly thereafter.

I have spoken with Assistant United States Attorney Antonia Apps, who consents to the requested adjournment. In addition, the defense consents to an exclusion of time under the Speedy Trial Act until the adjourned date.

Respectfully submitted,

STEVEN M. STATSINGER
Assistant Federal Defender
(212) 417-8736



cc: AUSA Antonia Apps

8/20/07
Motion deadline extended to 9/7/07;
conf adjourned from 8/23/07 until 9/7/07
at 2 p.m. Two excluded pursuant to
18 U.S.C. § 3161(h)(8)(A) from 8/20/07 until
9/7/07. The ends of justice outweigh the interests of the
public + the def. in a speedy trial.
So ordered.
J. J. Byrnes
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